

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,
Plaintiff,
vs.

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

STIPULATED FACTS AS BETWEEN PLAINTIFF AND DEFENDANT NETFLIX, INC.

Plaintiff, by and through his counsel, represents that the following are stipulated facts as between Plaintiff and Netflix, Inc. that are pertinent to the currently pending summary judgment motions:

1. Lisa Nishamura, Adam Del Deo, Benjamin Cotner, and Marjon Javadi were acting on behalf of Netflix, Inc. with respect to the production of Making a Murderer.
2. Netflix stipulates that, with the exception of the documents produced as NFXCOL0002392-0002398, which are records of Plaintiff's divorce proceedings obtained from the public court file, all other documents produced as of July 28, 2022 with an NFXCOL prefix in the Bates number came from files Netflix maintains in the ordinary course of business.
3. The Making a Murderer episodes that were filed by Netflix in the court record as Dkt. #120-1 through 120-10 are true and correct copies of the "Making a Murderer" episodes as

they were / are made available to Netflix, Inc. subscribers, except that the exhibits filed in the court record feature a watermark.

4. The License Agreement produced as NFXCOL 0000091-0000135 is the operative agreement between the Defendants relating to the “Making a Murderer” series, as amended in the Amendment to License Agreement produced as NFXCOL 0000031-0000035.

<p>Dated this 4th day of November, 2022.</p> <p>By: <u>/s/ April Rockstead Barker</u> April Rockstead Barker, SBN: 1026163 Rockstead Law, LLC 525 N. Lincoln Ave. Beaver Dam, WI 53916 T: (920) 887-0387 F: (262) 666-6483 aprilrbarker@rocksteadlaw.com</p> <p>George Burnett, SBN: 1005964 Conway, Olejniczak & Jerry, S.C. 231 S. Adams Street/PO Box 23200 Green Bay, WI 54305-3200 T: (920) 437-0476 GB@lcojlaw.com</p> <p>Counsel for Plaintiff Andrew Colborn</p>	<p>Dated this 4th day of November, 2022.</p> <p>By: <u>/s/ Leita Walker</u> Leita Walker Isabella Salomão Nascimento Ballard Spahr LLP 2000 IDS Center, 80 South 8th Street Minneapolis, MN 55402-2119 T: (612) 371-6222 F: (612) 371-3207 walkerl@ballardspahr.com salamaonascimento@ballardspahr.com</p> <p>Matthew E. Kelley Emmy Parsons Ballard Spahr LLP 1909 K Street, NW, Suite 1200 Washington, D.C. 20006-1157 T: (202) 508-1112 F: (202) 661-2299 kelley@ballardspahr.com parsonse@ballardspahr.com</p> <p>James A. Friedman Godfrey & Kahn, S.C. One East Main Street Suite 500 Madison, WI 53703-3300 T: (608) 284-2617 F: (608) 257-0609 jfriedman@gklaw.com</p> <p>Counsel for Defendant Netflix, Inc.</p>
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